Filed 09/07/2007





UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ADA ALICEA, on behalf of herself and all others similarly situated,

Plaintiff,

ν.

Case No. 07 Civ. 6123 (DC)

CIRCUIT CITY STORES, INC.,

ECF CASE

Defendant.

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Matthew G. Parisi, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name:

Turner A. Broughton

Firm Name:

Williams Mullen

Address:

1021 East Cary Street, P. O. Box 1320

City/State/Zip:

Richmond, VA 23218-1320

Phone Number:

804-783-6926

Fax Number:

804-783-6507

Turner A. Broughton is a member in good standing of the Bar of the States of Virginia.

There are no pending disciplinary proceeding against Turner A. Broughton in any State or Federal Court.

Dated:

September 5, 2007

City, State:

White Plains, New York

Respectfully submitted

Matthew G. Parisi (MGP-2188)

BLEAKLEY PLATT & SCHMIDT, LLP

One North Lexington Avenue White Plaints, New York 10601

Phone Number: 914-949-2700

Fax Number: 914-683-6956

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
ADA ALICEA, on behalf of herself and all others similarly situated,	:
Plaintiff,	
v.	Case No. 07 Civ. 6123 (DC)
CIRCUIT CITY STORES, INC.,	ECF CASE
Defendant.	

State of New York)	
)	SS
County of New York)	

Matthew G. Parisi, being duly sworn, hereby deposes and says as follows:

- 1. I am counsel at Bleakley Platt & Schmidt, LLP, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Turner A. Broughton as counsel pro hac vice to represent Defendant in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February 7, 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Turner A. Broughton since May 2007.
- 4. Mr. Broughton is counsel at Williams Mullen in Richmond, Virginia.
- 5. I have found Mr. Broughton to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Turner A. Broughton, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Turner A. Broughton, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Turner A. Broughton, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated:

September 5, 2007

City, State:

White Plains, New York

Respectfully submitted.

Matthew G. Parisi (MGP-2188)

BLEAKLEY PLATT & SCHMIDT, LLP

One North Lexington Avenue White Plaints, New York 10601 Phone Number: 914-949-2700

Fax Number: 914-683-6956

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Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia, do hereby certify that

TURNER ANDERSON BROUGHTON

was admitted to practice as an attorney and counsellor at the bar of this Court on November 2, 1998.

I further certify that so far as the records of this office are concerned, TURNER ANDERSON BROUGHTON is a member of the bar of this Court in good standing.

Witness my hand and seal of said Court

This 28th day of August

A.D. 2007

UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	

ADA ALICEA, on behalf of herself and all others similarly situated,

Plaintiff.

ν.

Case No. 07 Civ. 6123 (DC)

CIRCUIT CITY STORES, INC.,

ECF CASE

Defendant.

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Matthew G. Parisi, attorney for Circuit City Stores, Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

Turner A. Broughton

Firm Name: Address:

Williams Mullen

1021 East Cary Street, P. O. Box 1320 Richmond, VA 23218-1320

City/State/Zip:

804-783-6926

Phone Number:

Fax Number:

804-783-6507

Email Address:

tbroughton@williamsmullen.com

is admitted to practice pro hac vice as counsel for Circuit City Stores, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at <u>nysd.uscourts.gov</u>. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

New York, New York

United States District/Magistrate Judge

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)	
		SS.
COUNTY OF WESTCHESTER)	

VICTORIA REILLY LEHNING, being duly sworn, deposes and says: that deponent is not a party to the action, is over 18 years of age and resides at Westchester County.

That on the 5th day of September 2007, deponent served the within **NOTICE OF MOTION FOR ADMISSION** *PRO HAC VICE* of Turner A. Broughton upon:

David J. Meiselman, Esq. Meiselman, Denlea, Packman, Carton & Eberz P.C. 1311 Mamaroneck Avenue White Plains, New York 10605

at the address designated by said attorney(s) for that purpose by depositing a true copy of same enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.

VICTORIA REILLY LEHNING

Sworn to before me this 5TH day of September, 2007

Notary Public

SUSAN LAU
Notary Public. State of New York
No. 01LA6067358
Qualified in Westchester County
Commission Expires Dec. 10, 2007